



505688

**CITY OF DEARBORN**

MAYOR MICHAEL A. GUIDO

May 5, 1994

Mr. Don E. de Blasio  
U.S. EPA Region 5 (P-19J)  
Office of Public Affairs  
77 West Jackson Boulevard  
Chicago, Illinois 60604

RE: Ford Motor Company  
Allen Park Clay Mine Landfill  
Allen Park, Wayne County, Michigan

Dear Mr. de Blasio:

As mayor, and personally, I share the concern of many Dearborn citizens about Ford Motor Company's proposal to dispose of hazardous waste at its Allen Park Clay Mine. Since it appears that the site has met or exceeded all current EPA and Michigan Department of Natural Resource guidelines for PCB storage, I believe that it is time to establish a series of safeguards to allay the fears and to assure the well-being of citizens residing in nearby neighborhoods.

I ask for EPA and DNR assistance in implementing these safeguards, and call upon Ford Motor Company to further enhance its reputation as a good corporate citizen by addressing these issues in a positive manner before initiating any disposal of PCBs at the Allen Park Clay Mine.

Of major concern is the method to be used to transport the PCBs from remedial sites to the disposal site.

As has been reported, the PCBs will be dredged from river bottoms in southeastern Michigan. We all are aware that river bottom sediment generally is in a liquid state and, therefore, poses risks not associated with the transportation of solid hazardous waste. We must avoid at all costs the possibility of trucks and trailers leaking liquids because they are improperly loaded or stored.

I.1  
5/5/94

Mr. Don E. de Blasio  
May 5, 1994  
Page 2

Therefore, the City of Dearborn insists that before any disposal of PCBs, whether in liquid state or solidified, the method of transportation must not pose any public health or environmental risk.

Secondly, the City of Dearborn requests that it be given written notice at least 30 days in advance before any transportation of PCBs, and written notice seven days prior to the termination of the transportation of PCBs.

This simply is a matter of being prepared. We do not want to be surprised. We want the ability to respond quickly and effectively in the event of any transportation accident. We want the ability to protect our citizens.

Thirdly, all access to the clay mine should be limited to roadways which do not traverse or abut residential areas. Although the disposal system appears to be environmentally adequate, our citizens must not be exposed to PCBs in their neighborhoods.

Finally, we feel strongly that every step possible must be taken to eliminate the possibility of airborne particulates or contaminants emanating from the disposal site.

This concern intensifies when reviewing the Public Health Assessment for the Allen Park Clay Mine issued on March 16, 1994. The report noted that the capping of Cell 1 in the area adjacent to the proposed new disposal site resulted in the release of a high level of contaminated soil particles in the air. We simply cannot afford this type of incident in the operation of Cell 2.

Procedures must be enacted which eliminate the release of contaminated particulates during all stages of the disposal of PCBs, especially in unloading and daily cover up of hazardous waste. This is absolutely vital to protecting our citizens from exposure through the airways.

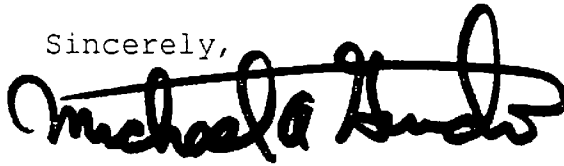
As a further precaution and safeguard, the City of Dearborn requests that it be provided with results of any and all monitoring of air quality. (See attached letter.)

Obviously, issues evolving from the proposal to dispose of PCBs at the Allen Park Clay Mine are of grave concern to the citizens of Dearborn, and they are deserving of the utmost attention and priority. The City of Dearborn stands prepared to assist the EPA in any manner which would assure that proper and effective safeguards are implemented.

Mr. Don E. de Blasio  
May 5, 1994  
Page 3

Confident that the EPA shares our concern over these vital health and safety issues, we seek a prompt response detailing the EPA's plans and timetables as it relates to making these requested procedures a reality.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael A. Guido". The signature is written in a cursive, flowing style with a large initial "M".

MICHAEL A. GUIDO  
Mayor

/ncm  
Enclosure



# 200 protest clay mine

## Attorneys ask more time for comment on landfill

By Joseph Cabadas  
Staff Writer

MELVINDALE — Destroy the PCBs, don't dump them on us, was the message about 200 angry people delivered to federal government officials Thursday.

On Tuesday they got a small reply — the EPA agreed to extend the public comment period to March 3. The original deadline was today.

Melvindale Corporation Counsel Randall Pentiuk asked for the extension to have time to review material that the city received just in the last two weeks, he said.

Pentiuk was among those at a public hearing who spoke against a proposal to dispose of PCBs at the Ford Motor Co. Allen Park Clay Mine Landfill.

The 200 attendees, including a host of local officials, told the EPA that they did not want the toxins. The PCBs, polychlorinated biphenyls, are in soil to be removed from the River Raisin in Monroe County under the supervision of the EPA.

"When the landfill leaks in 50 years or so, we will have to deal with the PCBs again," Melvindale Mayor Thomas Coogan said. "So, let's deal with the problem right now."

Coogan and Mayor Gerald Richards of Allen Park both suggested the EPA use methods to destroy the PCBs instead of dumping them.

**THE PROPOSED** disposal plan calls for dredging the contaminated soil from the river and disposing of it in Allen Park or a landfill in New York.

This plan is consistent with EPA and Michigan Department of Natural Resources guidelines and would cost \$5.1 million to \$16.2 million, officials said. Other methods that could

**"Sooner or later,  
an earthquake  
or something we don't  
know about will cause  
PCB leakage into the  
water supply."**

— State Rep.  
Robert DeMars

destroy PCBs would cost between \$21.1 million and \$55 million.

"Cost is the balancing criteria when choosing between different disposal methods," EPA cleanup project manager Pablo Valentin said.

**NOT BUYING** that argument, however, was Allen Park City Attorney Ken Kruse, who pointed out that the Allen Park site does not have a permit to receive PCBs.

"It is improper to consider the landfill as an alternative (disposal site) because it doesn't have a license," he said.

Kruse also argued that PCBs could eventually leak into nearby water and sewer lines.

"This site is a threat to the delivery of fresh water and clean storm sewers," he said.

However, EPA geologist Steve Johnson said "there is no pathway" for PCBs to take to contaminate the water main or the storm sewers.

Johnson said the area's "unusual geology" in which ground water seeps upward from an artesian sand zone would prevent the PCBs from contaminating the soil.

Additionally, the landfill cell —

where the PCBs would go — is separated from the ground water by a thick layer of clay and two multi-layered plastic liners. Each liner is separated by another 5-foot layer of compact clay.

**JOHNSON'S ARGUMENT** did not hold much water with residents or officials. State Rep. Robert DeMars (D-Lincoln Park) said that "sooner or later, an earthquake or something we don't know about will cause PCB leakage into the water supply."

Some residents also believe that Ford might bring toxins from out-of-state to Allen Park.

There is also a question about whether the landfill is in the Ecorse Creek's flood plain. If it were, it would not be allowed to accept PCBs.

A 1993 proposed map had extended the flood plain to Oakwood Boulevard and included the landfill. But a recent map, which has not yet been approved, reduced the flood plain's boundaries to the banks of the Ecorse Creek.

In addition, Johnson said Ford still has to develop a plan to take care of runoff from rain water to prevent PCB contaminants from going offsite.

The concerns over PCBs stem from the fact that they accumulate in the fat tissues of animals. People eating contaminated fish from the River Raisin could suffer the effects

of PCB poisoning, including cancer, immune system problems and problems with women's reproductive system.

**THE MONROE** Plant began operations in 1949 and manufactured automotive parts, such as wheel rims, bumpers and coil springs.

Prior to 1970, according to an EPA report, all waste water was discharged directly into the River Raisin. The major sources of waste water came from the cleaning, painting and plating processes.

By the 1970s, Ford built new discharge systems. However, when the EPA began investigating the site in 1973, it discovered PCB levels that violated federal discharge permits. Subsequent investigations showed that much of the contamination had come from the old discharge sewers.

As part of the cleanup, the contaminated soils will be removed from the river and the old discharge system will be cleaned out.

Last Wednesday, the EPA held a public comment session in Monroe. Reportedly, Monroe residents also want the EPA to look into cleaning other sites along the River Raisin that have been contaminated. However, Valentin said that the cleanup had to be restricted to the Ford site.

Once the public comment period is over, Valentin said, EPA and Ford officials will meet to discuss cleanup costs.



# Hearings set for EPA's PCB plan

By ANDY HALLDORSON  
Evening News staff writer

Monroe area residents are being asked by the U.S. Environmental Protection Agency (EPA) for input on the agency's proposal to clean a toxic hotspot in the River Raisin.

River soils are contaminated with PCBs near old drainage pipes from Monroe's Ford Motor Co. stamping plant, 3200 E. Elm Ave.

There will be two public hearings: at 7 p.m. Jan. 25 in council chambers at Monroe City Hall, 120 E. First St., and at 7 p.m. Jan. 26 in Melvindale. The latter is near Ford's Allen Park clay landfill where the toxic soils may be dumped.

Persons also may submit written opinions through Feb. 1 to Susan Pastor, P-19J, Office of Public Affairs, U.S. EPA Region 5, 77 West Jackson Blvd., Chicago, Ill., 60604.

The EPA plan is estimated to cost between \$5.1 million and \$16.2 million, depending on where the contaminated soil is dumped. It does not specify a timeframe.

The lower cost would be for dumping in Ford's Allen Park landfill — a proposal that was hotly protested by about 200 Melvindale residents at a summer hearing.

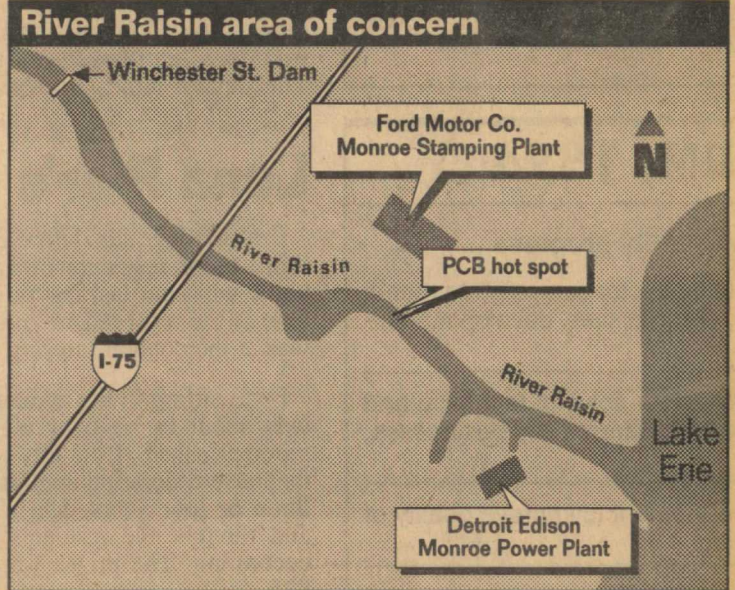
Many Melvindale residents were concerned the PCBs would leak through the landfill's clay bottom and contaminate their drinking water.

The costlier option would be to dump the contaminants in the Model City Landfill in New York.

Ford has offered to pay for the cleanup, although company officials have said previous land owners may be responsible for the pollution. Ford began operations at the plant in 1949.

The PCB concentrations in the hotspot are among the highest in the state. The EPA said the highest concentration has been measured at 42,167 parts per million, an amount the EPA considers "high," officials said.

Threats to people from PCB exposure include increased possibility of cancer, harm to the immune system and, for pregnant women, harm to unborn children.



—Evening News map by Jim Dombrowski

EPA officials said the primary threat to health in the Monroe area is through eating river fish, which store PCBs in fat tissue.

The EPA proposes dredging the area near the plant's old drainage pipes while using plastic sheets to prevent stirred contaminants from washing downstream.

The old drains, which were closed about 20 years ago, also would be cleaned out.

All soils near the drains with PCB concentrations higher than 10 ppm would be removed.

A detailed EPA fact sheet on the cleanup proposal is available at the Monroe Branch Library of the Monroe County Library System, 1135 E. Second St. Copies are also available at libraries in Allen Park, Dearborn and Melvindale.

The river cleanup is not related to Ford's plan to entomb toxic sludge in the lagoons behind its Monroe plant.